

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Darrin L. Jackson, individually and as Special Administrator  
for the estate of Floyd Jackson

Plaintiff,

v.

A. C. AND S., INC., a corporation; A.W. CHESTERTON  
COMPANY, a corporation; ANCHOR PACKING  
COMPANY, a corporation; CERTAIN-TEED CORP.;  
COMBUSTION ENGINEERING, INC., a corporation; CSR,  
LTD., a corporation; DURABLE MANUFACTURING  
COMPANY, a corporation; FERODO AMERICA, INC., a  
corporation; FOSTER WHEELER CORPORATION, as  
Parent Corporation to FOSTER WHEELER ENERGY  
CORPORATION, a corporation; FOSTER-WHEELER  
ENERGY CORP., a corporation; THE FLINTKOTE  
COMPANY, a corporation; GARLOCK, INC., a corporation;  
GENERAL ELECTRIC COMPANY, a corporation;  
GEORGIA-PACIFIC CORPORATION, a corporation; J.P.  
BUSHNELL PACKING & SUPPLY, a corporation;  
MAREMONT CORP., a corporation; METROPOLITAN  
LIFE INSURANCE COMPANY, a corporation; OWENS-  
ILLINOIS CORPORATION, a corporation; RAPID  
AMERICAN CORP., a corporation; and VIACOM, INC. as  
successor to WESTINGHOUSE ELECTRIC CORP., a  
corporation,

Defendants.

CASE NO.

**02C 2254**

In Re Asbestos Litigation

**DOCKETED**

**JUDGE GRADY MAR 29 2002**

**MAGISTRATE JUDGE MASON**

COMPLAINT

**COMPLAINT**

Now comes the plaintiff, Darrin L. Jackson, hereinafter "Plaintiff," and as special administrator for the estate of Floyd Jackson, hereinafter "Plaintiff's Decedent," by and through his attorneys, CASCINO VAUGHAN LAW OFFICES, LTD., and complains of A. C. AND S., INC., a corporation; A.W. CHESTERTON COMPANY, a corporation; ANCHOR PACKING COMPANY, a corporation; CERTAIN-TEED CORP.; COMBUSTION ENGINEERING, INC., a corporation; CSR, LTD., a

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corporation; DURABLE MANUFACTURING COMPANY, a corporation; FERODO AMERICA, INC., a corporation; FOSTER WHEELER CORPORATION, as Parent Corporation to FOSTER WHEELER ENERGY CORPORATION, a corporation; FOSTER-WHEELER ENERGY CORP., a corporation; THE FLINTKOTE COMPANY, a corporation; GARLOCK, INC., a corporation; GENERAL ELECTRIC COMPANY, a corporation; GEORGIA-PACIFIC CORPORATION, a corporation; J.P. BUSHNELL PACKING & SUPPLY, a corporation; MAREMONT CORP., a corporation; METROPOLITAN LIFE INSURANCE COMPANY, a corporation; OWENS-ILLINOIS CORPORATION, a corporation; RAPID AMERICAN CORP., a corporation; and VIACOM, INC. as successor to WESTINGHOUSE ELECTRIC CORP., a corporation, hereinafter "Defendants", as follows:

#### **JURISDICTION**

1. Plaintiff Darrin L. Jackson is an adult citizen of Illinois. Plaintiff's address is 8225 S. Colfax, Chicago, Illinois 60617. Plaintiff's Decedent worked around asbestos at various job sites in the states of Illinois and California during his career as a Pipefitter.
2. Defendants are all corporations, none of which is incorporated in or has its principal place of business in the State of Illinois, and at all times relevant to the allegations contained herein were engaged in the business of designing, manufacturing and selling asbestos and/or asbestos-containing products and/or asbestos-insulated equipment, hereinafter referred to as "asbestos products." Please refer to the attached Exhibit A for the state of incorporation and principal place of business of each defendant.
3. Jurisdiction is based on diversity of citizenship of the parties hereto under Title 28, United States Code, §1332.
4. The amount in controversy exceeds the sum of Seventy-Five Thousand Dollars (\$75,000), exclusive of interest and costs.
5. Venue is proper pursuant to Title 28, United States Code, §1391.

**GENERAL ALLEGATIONS**

6. Plaintiff's Decedent during the course of his employment at various job sites, including those listed on the attached Exhibit B, was exposed to asbestos dust or fibers emanating from the asbestos products and/or asbestos insulated equipment which was sold, manufactured, distributed, packaged, installed or otherwise placed into commerce by defendants.
7. Plaintiff's Decedent was ignorant of the dangerous nature of asbestos and of the nature of the risks incurred by workers working with or near asbestos products.
8. Plaintiff's Decedent became aware of the asbestos-related condition and that said condition was caused by Defendants' wrongful conduct within the statute of limitations before the filing of this action.
9. As a direct and proximate result of the conduct of Defendants, Plaintiff's Decedent developed and was diagnosed as having Lung Cancer. See medical report at Exhibit C, attached hereto and incorporated herein by this reference.
10. Plaintiff's Decedent suffered great pain, physical impairment, mental pain and anguish, losses to his personal property and possessions, and fear of death. Because of this the Plaintiff is liable for large sums of money.

**PRODUCTS LIABILITY - NEGLIGENCE**

11. It was reasonably foreseeable by Defendants that Plaintiff's Decedent and other workers would be working with or in the proximity of Defendants' asbestos products.
12. Defendants had a duty to exercise reasonable care for the safety of Plaintiff's Decedent and others who worked with or were exposed to Defendants' asbestos products.
13. Prior to, during, and after the time Defendants manufactured, produced, processed, packaged, designed, distributed, and/or shipped the asbestos products and/or asbestos insulated equipment to which Plaintiff's Decedent was exposed, Defendants knew, or in the exercise of ordinary or

reasonable care ought to have known, that exposure to their asbestos products caused disease and/or death and that Plaintiff's Decedent and/or others did not know that asbestos products were dangerous or harmful.

14. Notwithstanding the aforementioned duty, Defendants, and each of them, were negligent by one or more of the following acts or omissions in that they:
  - a. Failed to adequately warn Plaintiff's Decedent and/or others of the health hazards concerned with exposure to asbestos;
  - b. Failed to recommend and/or provide proper protective apparel, equipment, appliances, and/or packaging to ensure Plaintiff's Decedent's and/or other's safety;
  - c. Failed to warn Plaintiff's Decedent and/or others of the danger and harm of the asbestos after the products or equipment were installed at the premises;
  - d. Failed to investigate or test for the health effects of asbestos prior to distribution and sale;
  - e. Failed to instruct Plaintiff's Decedent, his employers and/or others in the use of precautionary measures relating to asbestos-containing products and/or asbestos-insulated equipment; and/or
  - f. Manufactured, supplied, or installed unsafe asbestos-containing products or asbestos-insulated equipment.
15. As a direct and proximate result of these negligent acts and/or omissions of Defendants, Plaintiff's Decedent endured suffering and injuries set forth in paragraph 9.

**DEFENDANT SPECIFIC COUNTS**

**A. C. AND S., INC.**

**COUNT 1 - PRODUCTS LIABILITY - NEGLIGENCE**

16. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 2 - WRONGFUL DEATH**

17. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 3 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

18. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**A.W. CHESTERTON COMPANY**

**COUNT 4 - PRODUCTS LIABILITY - NEGLIGENCE**

19. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 5 - WRONGFUL DEATH**

20. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 6 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

21. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**ANCHOR PACKING COMPANY**

**COUNT 7 - PRODUCTS LIABILITY - NEGLIGENCE**

22. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15)

based on negligence with respect to this defendant.

**COUNT 8 - WRONGFUL DEATH**

23. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 9 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

24. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**CERTAIN-TEED CORP.**

**COUNT 10 - PRODUCTS LIABILITY - NEGLIGENCE**

25. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 11 - WRONGFUL DEATH**

26. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 12 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

27. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**COMBUSTION ENGINEERING, INC.**

**COUNT 13 - PRODUCTS LIABILITY - NEGLIGENCE**

28. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 14 - WRONGFUL DEATH**

29. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 15 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

30. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**CSR, LTD.**

**COUNT 16 - PRODUCTS LIABILITY - NEGLIGENCE**

31. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 17 - WRONGFUL DEATH**

32. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 18 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

33. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**DURABLE MANUFACTURING COMPANY**

**COUNT 19 - PRODUCTS LIABILITY - NEGLIGENCE**

34. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 20 - WRONGFUL DEATH**

35. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 21 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

36. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**FERODO AMERICA, INC.**

**COUNT 22 - PRODUCTS LIABILITY - NEGLIGENCE**

37. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 23 - WRONGFUL DEATH**

38. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 24 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

39. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**FOSTER WHEELER CORPORATION**

**as Parent Corporation to FOSTER WHEELER ENERGY CORPORATION**

**COUNT 25 - PRODUCTS LIABILITY - NEGLIGENCE**

40. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 26 - WRONGFUL DEATH**



41. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 27 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

42. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**FOSTER-WHEELER ENERGY CORP.**

**COUNT 28 - PRODUCTS LIABILITY - NEGLIGENCE**

43. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 29 - WRONGFUL DEATH**

44. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 30 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

45. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**THE FLINTKOTE COMPANY**

**COUNT 31 - PRODUCTS LIABILITY - NEGLIGENCE**

46. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 32 - WRONGFUL DEATH**

47. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of

Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 33 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

48. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**GARLOCK, INC.**

**COUNT 34 - PRODUCTS LIABILITY - NEGLIGENCE**

49. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 35 - WRONGFUL DEATH**

50. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 36 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

51. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**GENERAL ELECTRIC COMPANY**

**COUNT 37 - PRODUCTS LIABILITY - NEGLIGENCE**

52. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 38 - WRONGFUL DEATH**

53. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 39 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

54. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**GEORGIA-PACIFIC CORPORATION**

**COUNT 40 - PRODUCTS LIABILITY - NEGLIGENCE**

55. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 41 - WRONGFUL DEATH**

56. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 42 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

57. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**J.P. BUSHNELL PACKING & SUPPLY**

**COUNT 43 - PRODUCTS LIABILITY - NEGLIGENCE**

58. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 44 - WRONGFUL DEATH**

59. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 45 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

60. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**MAREMONT CORP.**

**COUNT 46 - PRODUCTS LIABILITY - NEGLIGENCE**

61. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 47 - WRONGFUL DEATH**

62. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 48 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

63. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**METROPOLITAN LIFE INSURANCE COMPANY**

**COUNT 49 - PRODUCTS LIABILITY - NEGLIGENCE**

64. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 50 - CONSPIRACY**

65. This claim is brought against defendant METROPOLITAN LIFE INSURANCE COMPANY for civil conspiracy and Plaintiff incorporates paragraphs 1 - 15 and 70 above.
66. Said defendant and co-conspirators had actual knowledge or through the exercise of ordinary care should have known as early as the 1930's that exposure to asbestos caused serious disease and

death; that the risks and health hazards of asbestos were not widely known; and that the general public in the United States was ignorant of the hazardous properties of asbestos.

67. Defendant METROPOLITAN LIFE INSURANCE COMPANY and other unnamed co-conspirators knowingly and willfully combined, agreed, and conspired with each other for the purpose of accomplishing one or more of the following unlawful purposes:
- a. Suppressing information about the health hazards of asbestos, including medical and scientific data, from those persons who would be exposed to the asbestos from the products made and sold by the conspirators,
  - b. Affirmatively asserting, in a manner not warranted by the information possessed by the conspirators, claims that the conspirators knew were false, namely, that it was safe to work with and in close proximity to asbestos.
68. The conspirators, including METROPOLITAN LIFE INSURANCE COMPANY, in communications between each other and through participation in trade organizations and committees of such trade organizations, ratified and adopted the unlawful purposes and conduct of the conspiracy.
69. Defendant METROPOLITAN LIFE INSURANCE COMPANY and one or more of the conspirators performed the following tortious acts in furtherance of the conspiracy:
- a. Manufactured, sold, packaged or installed unreasonably dangerous asbestos products to which the Plaintiff's Decedent was exposed,
  - b. Failed to warn about health hazards of asbestos, failed to investigate health hazards of asbestos or failed to instruct about precautionary measures required for protection;
70. The agreement between METROPOLITAN LIFE INSURANCE COMPANY and the conspirators and acts done in furtherance of the agreement were the proximate causes of the injuries set forth above in paragraph 9.

**COUNT 51 - WRONGFUL DEATH**

71. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 52 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

72. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**OWENS-ILLINOIS CORPORATION**

**COUNT 53 - PRODUCTS LIABILITY - NEGLIGENCE**

73. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 54 - WRONGFUL DEATH**

74. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 55 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

75. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**RAPID AMERICAN CORP.**

**COUNT 56 - PRODUCTS LIABILITY - NEGLIGENCE**

76. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 57 - WRONGFUL DEATH**

77. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 58 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

78. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**VIACOM, INC.**

**COUNT 59 - PRODUCTS LIABILITY - NEGLIGENCE**

79. Plaintiff reasserts and incorporates herein by this reference the above claims (paragraphs 1 - 15) based on negligence with respect to this defendant.

**COUNT 60 - WRONGFUL DEATH**

80. Defendants actions as described in the preceding paragraphs (1 - 15) caused the wrongful death of Plaintiff's Decedent and damages have been suffered by Plaintiff.

**COUNT 61 - RECOVERY OF FUNERAL AND BURIAL EXPENSES**

81. Defendants actions as described in the preceding paragraphs (1 - 15) have resulted in Plaintiff and the estate of Plaintiff's Decedent incurring funeral and burial expenses from the death of Plaintiff's Decedent.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief as follows:

1. Judgement against Defendants, jointly and severally, for compensatory and general damages in excess of \$75,000 plus costs.
2. Such further legal and equitable relief as the Court orders to do justice in this case; costs and disbursements of this action.

**JURY TRIAL DEMAND**

Plaintiff hereby demands a trial by a jury of 6.

Dated this 25th day of March, 2002.

A handwritten signature in black ink, appearing to read "Michael P. Cascino", written over a horizontal line.

One of the Plaintiff's Attorneys

MICHAEL P. CASCINO  
CASCINO VAUGHAN LAW OFFICES, LTD.  
220 South Ashland Avenue  
Chicago, Illinois 60607  
312-944-0600  
312-944-1870 fax



**Exhibit A**  
**Defendants' Home States and Principal Places of Business**

A.C. and S., Inc.	Delaware	Pennsylvania
A.W. Chesterton Company	Massachusetts	Massachusetts
The Anchor Packing Company	Delaware	Texas
Ceratain-Teed	Delaware	Pennsylvania
Combustion Engineering, Inc.	Delaware	Massachusetts
C S R, Ltd.	Australia	Australia
Durabla Manufacturing Company	New York	Pennsylvania
Ferodo America, Inc.	Delaware	Tennessee
Foster Wheeler Corporation, as Parent Corporation to Foster Wheeler Energy Corporation	New York	New Jersey
Foster Wheeler Energy Corp	Delaware	New Jersey
The Flintkote Company	Delaware	California
Garlock, Inc.	Ohio	Ohio
Gasket Holdings, Inc.	Delaware	Texas
General Electric Company	New York	Connecticut
Georgia-Pacific Corporation	Georgia	Georgia
J.P. Bushnell Packing & Supply	Missouri	Missouri
Maremont Corp.	Delaware	Indiana
Metropolitan Life Insurance Co.	New York	New York
Owens-Illinois Corporation	Delaware	Ohio
Rapid American Corp.	Delaware	Pennsylvania
Viacom, Inc. as successor to Westinghouse Electric Corp.	Delaware	New York

**Distribution List:**

A C AND S INC  
C/O C T CORPORATION SYSTEM  
208 S LASALLE ST STE 814

## Exhibit B

### Work History of Floyd Jackson

Last	First	FirstYrld	LastYrld	SiteLocation	SiteCity	SiteSt
Jackson	Floyd	1967	1976	Corn Products	Argo	IL
Jackson	Floyd	1976	1982	Long Beach Naval Shipyard	Long Beach	CA



\*\*\*Final Report\*\*\*

COOK COUNTY BUREAU OF HEALTH SERVICES  
COOK COUNTY HOSPITAL  
CAT SCAN DEPARTMENT

Printed: May 16, 2000 1:41am

Patient Name:	JACKSON, FLOYD	Sex:	M
Admission No:	000127830156	DOB:	07/10/1943
Med. Rec. No:	002510124	Pt Age:	
Referring Dr:	MUHAMMAD IQBAL, MD 022285	Pt Class:	I
Ordering Dr:	MUHAMMAD IQBAL, MD 022285	Order No:	90004
Admission Date:	05/12/2000	Pt Location:	30-301601
Discharge Date:		Hosp Svc:	FRC

DATE OF EXAM: May 14 2000 ACC #: 5892012CCT 5102 - CHEST W/IV CONTRAST :  
CLINICAL HISTORY: CHEST PAIN SHORTNESS OF BREATH RULE OUT TB FINDINGS: CT CHEST:

1. 4 CM. SOFT TISSUE MASS IN RIGHT UPPER LUNG, PROBABLY POSTERIOR SEGMENT, MOST C/W NEOPLASM. THERE IS CONFLUENT OPACIFICATION OF THE RIGHT HILUM WITH PATCHY ALVEOLAR AND INTERSTITIAL OPACIFICATION OF THE ADJ LUNG: R/O PNEUMONIA & HILAR ADENOPATHY. RIGHT PLEURAL EFFUSION (5 CM. AP). MINIMAL INTERSTITIAL PROMINENCE OF THE LEFT PERIHILAR AND LOWER LUNG WITH SCARRING.

2. CARDIOMEGALY WITH PROMINENCE TO THE PROXIMAL PULMONARY VASCULATURE. MULTIPLE SOFT TISSUE DENSITIES THROUGHOUT THE RETROCAVAL, PREVASCULAR, PRE AND SUBCARINAL AND AORTOPULMONARY MEDIASTINUM C/W MEDIASTINAL ADENOPATHY.

3. EVALUATION OF THE UPPER ABDOMEN IS LIMITED BY LACK OF ORAL CONTRAST ALTHOUGH THERE MAY BE SOME MURAL THICKENING OF DISTAL ESOPHAGUS AT GASTROESOPHAGEAL JUNCTION, CORRELATE FOR ESOPHAGITIS. PUNCTATE (5 MM.) DENSITIES IN THE EPIGASTRIC AND PARA-AORTIC REGIONS SUGGEST SMALL LYMPH NODES OR VARICES. CLINICAL CORR. ATHEROSCLEROSIS. ADRENALS, LIVER, SPLEEN, KIDNEYS, URETERS, VISUALIZED BOWEL ARE GROSSLY UNREMARKABLE.

4. PERIPHERAL OSSEOUS/SOFT TISSUE UNREMARKABLE.

IMPRESSION: 1. RIGHT UPPER LUNG 4 CM. MASS WITH HILAR AND MEDIASTINAL ADENOPATHY, PARAHILAR PNEUMONIA AND RIGHT EFFUSION. FINDINGS SUGGEST NONRESECTABLE PRIMARY LUNG NEOPLASM. OTHER ETIOLOGY CANNOT BE EXCLUDED.

2. CARDIOMEGALY.

3. POSSIBLE EPIGASTRIC AND PARA-AORTIC SMALL LYMPH NODES VS. ESOPHAGITIS, VARICES.

4. SERVICE NOTIFIED.

Transcriptionist: BJJ

Transcribe Date/Time: May 15 2000 2:53P

Read by : JOHN N LARSON ,M.D.

This document has been electronically

Signed by: JOHN N LARSON ,M.D. On: May 15 2000 3:38P

IMAGING SERVICES CONSULTATION

NAME: JACKSON, FLOYD  
MR#: 002510124

ACCT #: 000127830156

\*\*\*Final Report\*\*\*

COOK COUNTY BUREAU OF HEALTH SERVICES  
COOK COUNTY HOSPITAL  
DIAGNOSTIC WITHOUT CONTRAST DEPARTMENT

Printed: June 22, 2000 1:25am

Patient Name:	JACKSON, FLOYD	Sex:	M
Admission No:	000128317997	DOB:	07/10/1943
Med. Rec. No:	002510124	Pt Age:	
Referring Dr:	SURESH NUKALA, MD 015677	Pt Class:	O
Ordering Dr:		Order No:	90018
Admission Date:	06/01/2000	Pt Location:	250-
Discharge Date:		Hosp Svc:	ONC

DATE OF EXAM: Jun 12 2000 ACC #: 5914758

CDN 1057 - CHEST PORTABLE EXAM :

CLINICAL HISTORY: CHEST PAIN SHORTNESS OF BREATH RULE OUT TB

FINDINGS: Chest portable exam done on June 12, 2000 at 6:00 pm.

When compared to the previous study of June 11, 2000, there is no appreciable change in the cardiopulmonary status. Again identified is the right central mass with post obstructive pneumonia mainly in the right upper and lower lobes. Again identified is a moderate amount of right pleural effusion most likely malignant which is also unchanged. The previously mentioned semi lunar lucencies most likely due to loculated less than 5% pneumothorax are also re-identified and again unchanged. A right chest tube remains in place.

The haziness in the left lower lung has increased however. This may represent a new onset left pleural effusion and/or left basal pneumonia. Follow up exam for this recommended.

Mild congestive failure and fluid overload is noted along with cardiomegaly.

IMPRESSION: AS ABOVE.

Transcriptionist: JMH  
Transcribe Date/Time: Jun 21 2000 8:04A  
Read by : PAMELA SOBTI, M.D.

This document has been electronically  
Signed by: PAMELA SOBTI, M.D. On: Jun 21 2000 1:49P

IMAGING SERVICES CONSULTATION NAME: JACKSON, FLOYD ACCT #: 000128317997  
MR#: 002510124

\*\*\*Final Report\*\*\*

COOK COUNTY BUREAU OF HEALTH SERVICES  
COOK COUNTY HOSPITAL  
DIAGNOSTIC WITHOUT CONTRAST DEPARTMENT

Printed: June 26, 2000 1:30am

Patient Name:	JACKSON, FLOYD	Sex:	M
Admission No:	000128269032	DOB:	07/10/1943
Med. Rec. No:	002510124	Pt Age:	
Referring Dr:	JOHN JAY SHANNON, MD 008169	Pt Class:	I
Ordering Dr:	JOHN JAY SHANNON, MD 008169	Order No:	90025
Admission Date:	05/31/2000	Pt Location:	31-311201
Discharge Date:		Hosp Svc:	FAM

DATE OF EXAM: Jun 23 2000 ACC #: 5924635

CDN 1057 - CHEST PA ONLY :

CLINICAL HISTORY: Pneumothorax. Carcinoma of the lung. Post pleurodesis

FINDINGS: The film was taken with more penetration than that of 19 June. The chest tube is unchanged. A small pneumothorax extends from the right mid lung zone of the base. An opaque mantle is seen around the entire right lung. An area of consolidation is seen in the right base with focal acinar density seen in the right upper lung zone.

Since the previous study the left pulmonary vessels are sharper.

IMPRESSION:

- LOCULATED SMALL RIGHT BASAL PNEUMOTHORAX.
- RIGHT PLEURAL THICKENING.
- GAS RIGHT MID AND LOWER LUNG ZONE WHICH MAY EXTEND UP TO THE APEX.
- RESOLUTION IN LEFT PULMONARY CONGESTION.

Transcriptionist: SMT  
Transcribe Date/Time: Jun 25 2000 11:54A  
Read by : JOHN FITZPATRICK ,M.D.

This document has been electronically  
Signed by: JOHN FITZPATRICK ,M.D. On: Jun 25 2000 3:01P

IMAGING SERVICES CONSULTATION

NAME: JACKSON, FLOYD  
MR#: 002510124

ACCT #: 000128269032



ALVIN J. SCHONFELD, D.O., F.C.C.P., A.A.D.E.P.  
 FLOYD JACKSON PULMONARY MEDICINE  
 OCCUPATIONAL LUNG DISEASE/

WORKER'S Social Security Number

TYPE OF READING

438 W. ST. JAMES PLACE  
CHICAGO, IL 60614

355329936

A P

<b>1A. DATE OF X-RAY</b> MONTH DAY YR 06 06 00	<b>1B. FILM QUALITY</b> 1 2 3 4 U/R 1 2 3 4 U/R	<b>1C. IS FILM COMPLETELY NEGATIVE?</b> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>												
<b>2A. ANY PARENCHYMAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?</b> YES <input checked="" type="checkbox"/> COMPLETE 2B and 2C NO <input type="checkbox"/> PROCEED TO SECTION 3														
<b>2B. SMALL OPACITIES</b> a. SHAPE/SIZE PRIMARY SECONDARY <table border="1" style="display: inline-table; margin-right: 20px;"> <tr><td>p</td><td>x</td></tr> <tr><td>q</td><td>t</td></tr> <tr><td>r</td><td>u</td></tr> </table> <table border="1" style="display: inline-table; margin-right: 20px;"> <tr><td>p</td><td>x</td></tr> <tr><td>q</td><td>t</td></tr> <tr><td>r</td><td>u</td></tr> </table>		p	x	q	t	r	u	p	x	q	t	r	u	<b>2C. LARGE OPACITIES</b> SIZE <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C PROCEED TO SECTION 3
p	x													
q	t													
r	u													
p	x													
q	t													
r	u													
<b>3A. ANY PLEURAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS?</b> YES <input checked="" type="checkbox"/> COMPLETE 3B, 3C and 3D NO <input type="checkbox"/> PROCEED TO SECTION 4														
<b>3B. PLEURAL THICKENING</b> a. DIAPHRAGM (plaque) SITE <input checked="" type="checkbox"/> R <input type="checkbox"/> L b. COSTOPHRENIC ANGLE SITE <input checked="" type="checkbox"/> R <input type="checkbox"/> L	<b>3C. PLEURAL THICKENING ... Chest Wall</b> a. CIRCUMSCRIBED (plaque) SITE <input checked="" type="checkbox"/> R <input type="checkbox"/> L IN PROFILE i. WIDTH 0 1 2 3 ii. EXTENT 0 1 2 3 FACE ON iii. EXTENT 0 1 2 3 b. DIFFUSE SITE <input checked="" type="checkbox"/> R <input type="checkbox"/> L IN PROFILE i. WIDTH 0 1 2 3 ii. EXTENT 0 1 2 3 FACE ON iii. EXTENT 0 1 2 3													
<b>3D. PLEURAL CALCIFICATION</b> SITE <input checked="" type="checkbox"/> R <input type="checkbox"/> L EXTENT a. DIAPHRAGM 0 1 2 3 b. WALL 0 1 2 3 c. OTHER SITES 0 1 2 3														
<b>4A. ANY OTHER ABNORMALITIES?</b> YES <input checked="" type="checkbox"/> COMPLETE 4B and 4C NO <input type="checkbox"/> PROCEED TO SECTION 5														
<b>4B. OTHER SYMBOLS (OBLIGATORY)</b> O ax bu <input checked="" type="checkbox"/> cn co cp cv di <input checked="" type="checkbox"/> em es fr hi ho id ih ki pi px rp tb Report items which may be of present clinical significance in this section. (SPECIFY od.) <input type="checkbox"/> OD Date Personal Physician notified? MONTH DAY YR														
<b>4C. OTHER COMMENTS</b> R/O MESOTHELIOMA (R) CANNOT SEE LUNG PARENCHYMA ON (R)														
SHOULD WORKER SEE PERSONAL PHYSICIAN BECAUSE OF COMMENTS IN SECTION 4C. <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO PROCEED TO SECTION 5														
<b>5. FILM READER'S INITIALS</b> AIJS														
<b>PHYSICIAN'S SOCIAL SECURITY NUMBER</b> 274445525														
<b>DATE OF READING</b> MONTH DAY YR 08 03 01														
<b>NAME (LAST-FIRST-MIDDLE)</b> ALVIN J. SCHONFELD														



CHICAGO IL 60603-1135

A W CHESTERTON CO.  
C/O MR. MICHAEL MCCAULEY  
533 TAFT BOULEVARD  
SOUTH HOLLAND, IL 60473

THE ANCHOR PACKING COMPANY  
C/O THE CORPORATION TRUST CO.  
1209 N. ORANGE STREET  
WILMINGTON DE 19801

CERTAIN-TEED CORPORATION  
C/O THE CORPORATION TRUST CO.  
1209 N. ORANGE ST.  
WILMINGTON, DE 19801

COMBUSTION ENGINEERING, INC.  
C/O THE CORPORATION TRUST COMPANY  
1209 N. ORANGE STREET  
WILMINGTON, DE 19801

C S R LTD  
MICHAEL P. CASEY, ESQ.  
LEWIS RICE & FINGERSH  
500 NORTH BROADWAY  
SUITE 2000  
ST. LOUIS MO 63102

GENERAL COUNSEL  
DURABLA MANUFACTURING CO.  
140 SHEREE BLVD.  
LYONVILLE PA 19341-1256

FERODO AMERICA, INC.  
C/O THE CORPORATION TRUST COMPANY  
1209 N. ORANGE STREET  
WILMINGTON DE 19801

FOSTER-WHEELER CORPORATION, AS PARENT CORPORATION TO  
FOSTER WHEELER ENERGY CORP.  
C/O PRENTICE HALL CORP. SYSTEMS  
4845 JIMMY CARTER BLVD.  
NORCROSS GA 30093

FOSTER-WHEELER ENERGY CORP.  
C/O U.S. CORPORATION COMPANY  
1013 CENTRE ROAD  
WILMINGTON DE 19805

THE FLINTKOTE COMPANY  
C/O CORPORATION TRUST COMPANY  
1209 N. ORANGE STREET  
WILMINGTON DE 19801

GARLOCK INC  
C/O C T CORPORATION SYSTEM  
208 S LASALLE ST STE 814  
CHICAGO IL 60604-1135

GENERAL ELECTRIC COMPANY  
C/O C T CORPORATION SYSTEM  
1209 N. ORANGE STREET  
WILMINGTON DE 19801

GEORGIA-PACIFIC CORPORATION  
C/O C T CORPORATION SYSTEM  
208 S LASALLE ST STE 814  
CHICAGO IL 60604-1135

J.P. BUSHNELL PACKING AND SUPPLY  
C/O LEGAL COUNSEL  
3041 LOCUST STREET  
SAINT LOUIS, MO 63103

MAREMONT CORP.  
C/O THE CORPORATION TRUST COMPANY  
CORPORATION TRUST DRIVE  
1209 N. ORANGE STREET  
WILMINGTON DE 19801

METROPOLITAN LIFE INSURANCE CO  
1 MADISON AVE  
NEW YORK NY 10010-3690

OWENS-ILLINOIS CORPORATION  
C/O CT CORPORATION SYSTEMS  
1635 MARKET STREET  
PHILADELPHIA, PA 19103

RAPID-AMERICAN CORPORATION  
C/O PRENTICE HALL CORPORATION SYS  
1013 CENTRE ROAD  
WILMINGTON DE 19805

VIACOM, INC. AS SUCCESSOR TO WESTINGHOUSE ELECTRIC CORPORATION  
C/O LEGAL COUNSEL  
1515 BROADWAY  
NEW YORK, NY 10036

JS 44 (Rev. 3/99)

## CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet.

## PLAINTIFFS

Darrin L. Jackson, individually and as Special Administrator for the estate of Floyd Jackson

(b) County of Residence of First Listed Plaintiff Cook  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)  
Cascino Vaughan Law Offices, Ltd.  
220 South Ashland Avenue  
Chicago Illinois 60607  
(312) 944-0600 - (312) 944-1870 (fax)

## DEFENDANTS

**DOCKETED**  
**MAR 29 2002**  
A. C. AND S., INC., et al

County of Residence of First Listed Defendant  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ 1 ☐ 1 Incorporated or Principal Place of Business In This State  
Citizen of Another State ☐ 2 ☒ 2 Incorporated and Principal Place of Business In Another State  
Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input checked="" type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutional of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR		
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act		

## V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

28 USC § 1332

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ Over \$75,000

CHECK YES only if demanded in complaint:

JURY DEMAND:

X Yes ☐ No

## VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DOCKETED**

MAR 29 2002

**02C 2254**

Darrin L. Jackson, individually and as Special Administrator  
for the estate of Floyd Jackson

CASE NO.

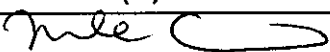
**Plaintiff,**

v.

A. C. AND S., INC., et al

**Defendants.****JUDGE GRADY****MAGISTRATE JUDGE MASON**FILED-ED  
02 MAR 28 PM 3:05CLERK  
U.S. DISTRICT COURT

**Appearances are hereby filed by the undersigned as attorney of record for**  
Darrin L. Jackson, individually and as Special Administrator for the estate of Floyd Jackson

(A)	(B)
SIGNATURE: 	SIGNATURE:
NAME: <b>Michael P. Cascino</b>	NAME:
FIRM: <b>Cascino Vaughan Law Offices, Ltd. 220 South Ashland Ave. Chicago Illinois 60607 (312) 944-0600</b>	FIRM: <b>Cascino Vaughan Law Offices, Ltd. 220 South Ashland Ave. Chicago Illinois 60607 (312) 944-0600</b>
IDENTIFICATION NUMBER: <b>3124122</b>	IDENTIFICATION NUMBER:
MEMBER OF TRIAL BAR: <b>YES [X] NO [ ]</b>	MEMBER OF TRIAL BAR: <b>YES [ ] NO [ ]</b>
TRIAL ATTORNEY: <b>YES [X] NO [ ]</b>	TRIAL ATTORNEY: <b>YES [ ] NO [ ]</b>
(C)	(D)
SIGNATURE:	SIGNATURE:
NAME:	NAME:
FIRM: <b>Cascino Vaughan Law Offices, Ltd. 220 South Ashland Ave. Chicago Illinois 60607 (312) 944-0600</b>	FIRM: <b>Cascino Vaughan Law Offices, Ltd. 220 South Ashland Ave. Chicago Illinois 60607 (312) 944-0600</b>
IDENTIFICATION NUMBER:	IDENTIFICATION NUMBER:
MEMBER OF TRIAL BAR: <b>YES [ ] NO [ ]</b>	MEMBER OF TRIAL BAR: <b>YES [ ] NO [ ]</b>
TRIAL ATTORNEY: <b>YES [ ] NO [ ]</b>	TRIAL ATTORNEY: <b>YES [ ] NO [ ]</b>

1-3